

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

**CIVIL ACTION NO. 3:23-CV-00667**

JANE DOE

*Plaintiff,*

v.

FARD SULTAN

*Defendant.*

**JOINT MOTION TO STAY DEADLINES  
PENDING REVIEW OF THE PARTIES'  
MOTION FOR ENTRY OF  
STIPULATED PERMANENT  
INJUNCTION AND FINAL JUDGMENT**

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Civil Rules 7.1 and 16.3, Plaintiff Jane Doe (“Plaintiff”) and Defendant Fard Sultan (“Defendant”) hereby jointly request a stay and/or extension of the current deadlines to complete mediation and submit dispositive motions in this matter, so that the parties may avoid unnecessary burden and expense while the Court is reviewing their Joint Motion for Entry of Stipulated Permanent Injunction and Final Judgment. In support of this motion, Plaintiff and Defendant jointly show the following:

1. Pursuant to the Case Management Order entered in this matter (ECF No. 15), the deadline for the parties to file dispositive motions is July 25, 2024. Pursuant to the Order entered on July 22, 2024 (ECF No. 17), the deadline for the parties to complete mediation is August 6, 2024.

2. Along with this Joint Motion, the parties submitted a Joint Motion for Entry of Stipulated Permanent Injunction and Final Judgment, which includes a proposed Stipulated Permanent Injunction and Final Judgment.

3. The parties negotiated and reached agreement on the Stipulated Permanent Injunction and Final Judgment which, if entered by the Court, would conclude this civil action.

4. The parties believe that entry of the Stipulated Permanent Injunction and Final Judgment is in their best interests and have a reasonable anticipation and belief that the Court will agree after its review and enter the Stipulated Permanent Injunction and Final Judgment.

5. Given that the parties have a reasonable anticipation and belief that this case will come to an end following the Court's review of the proposed Stipulated Permanent Injunction and Final Judgment, in the interests of efficiency and justice, the parties would like to avoid the burden and expense of summary judgment motions/briefing and mediation. Accordingly, the parties request a stay and/or extension of the current deadlines to complete mediation and file dispositive motions during the time necessary for the Court to consider their Joint Motion for Entry of Stipulated Permanent Injunction and Final Judgment. In the event the Court declines to enter the Stipulated Permanent Injunction and Final Judgment, the parties ask for a reasonable time thereafter to complete mediation and, if necessary, file dispositive motions.

6. Again, to reiterate, the parties are hopeful that the Court will enter the Stipulated Permanent Injunction and Final Judgment, which would conclude this matter and render mediation and dispositive motions unnecessary.

7. The deadlines that are the subject of this motion have not yet passed.

8. Counsel for Plaintiff and Defendant spoke by telephone on Wednesday, July 24, 2024, during which they discussed the need for this motion and reached agreement for it to be submitted as a joint filing. Because Defendant is proceeding *pro se* and is not a registered ECF e-filer, this joint motion is submitted by the undersigned by agreement on behalf of both parties.

WHEREFORE, for the foregoing reasons, the parties jointly request a stay and/or extension of the current deadlines to complete mediation and submit dispositive motions in this matter, so that the parties may avoid unnecessary burden and expense while the Court is reviewing their Joint Motion for Entry of Stipulated Permanent Injunction and Final Judgment.

This the 24th day of July, 2024.

**/s/ L. Cooper Harrell**

L. Cooper Harrell

N.C. State Bar No. 27875

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing document has been served by first class mail as follows:

Fard Sultan  
801 S. Main Street, Apt. #220  
Mount Holly, NC 28210

This the 24th day of July, 2024.

**/s/ L. Cooper Harrell**

L. Cooper Harrell